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10 Attorneys for Claimant
11 JIA YUE

12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN FRANCISCO DIVISION

15 UNITED STATES OF AMERICA,

16 Plaintiff,

17 v.

18 \$10,000 IN UNITED STATES CURRENCY,

19 Defendant.

Case No. 3:10-cv-00167-VRW

**STIPULATION AND ~~PROPOSED~~
ORDER TO STAY CASE**

Judge: Vaughn R. Walker

Complaint Filed: January 13, 2010

Notice Sent: January 20, 2010

1 WHEREAS, Claimant Jia Yue filed a verified claim for forfeiture in rem on February 24,
2 2010 (Docket No. 8); and

3 WHEREAS, pursuant to the stipulation dated March 12, 2010 (Docket No. 12), Claimant
4 must file an answer or otherwise respond to the complaint for forfeiture by April 20, 2010; and

5 WHEREAS, the Court, by Clerk's Notice dated March 15, 2010 (Docket No. 13),
6 scheduled a Case Management Conference for May 27, 2010 at 3:30 PM, and ordered the parties
7 to file a Joint Case Management Statement one week before this conference; and

8 WHEREAS, Claimant and the Government are attempting to negotiate a resolution of
9 this case and of the related criminal case of *United States v. Jia Yue*, No. 09-CR-917-VRW; and

10 WHEREAS, the parties wish to stay this case in order to reach a negotiated resolution of
11 both these cases; and

12 WHEREAS, no party will be prejudiced by this stay,

13 THEREFORE, it is stipulated by and between the Claimant and the Government that:

14 1. This case shall be stayed pending a negotiated resolution of this case and of the
15 related criminal case;

16 2. The deadline for Claimant to file an answer or otherwise respond to the complaint
17 for forfeiture shall be vacated;

18 3. In the event the parties inform the Court that they could not reach a negotiated
19 resolution and the Court orders the stay to be lifted, the deadline for Claimant to file an answer
20 or otherwise respond to the complaint for forfeiture shall be reset to no less than thirty days from
21 the date of entry of the Court's order lifting the stay; and

22 3. The Case Management Conference scheduled for May 27, 2010 shall be taken off
23 calendar and the related deadline for filing a Joint Case Management Statement shall be vacated.

1 SO STIPULATED.

2 Dated: April 16, 2010

3
4 By: /s/ Stephanie M. Hinds
5 STEPHANIE M. HINDS
6 Assistant United States Attorney

7 Dated: April 16, 2010

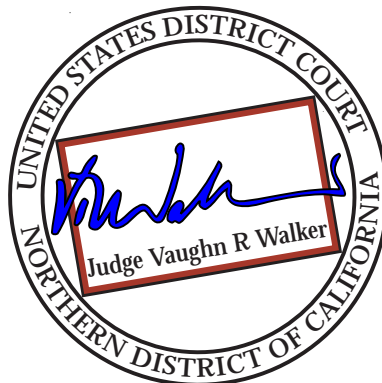
8 KEKER & VAN NEST LLP

9 By: /s/ Matan Shacham
10 ELLIOT R. PETERS
11 BROOK DOOLEY
12 GALIA A. PHILLIPS
13 MATAN SHACHAM
14 Attorneys for Claimant
15 JIA YUE

16 **ORDER**

17 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

18 Dated: 4/28, 2010



ATTESTATION OF CONCURRENCE IN FILING

I hereby attest that Stephanie M. Hinds has concurred in the filing of this document.

/s/ Matan Shacham

MATAN SHACHAM